

UNITED STATES BANKRUPTCY COURT DISTRICT OF NEW JERSEY
Albert Russo CN 4853 Trenton, New Jersey 08650 (609) 587-6888 STANDING CHAPTER 13 TRUSTEE
In Re: LAKHVINDER SINGH MARJIT KAUR Debtors

Case No: 17-13022 CMG

Chapter 13

Hearing Date: 11/7/18 @ 10:00 AM

Judge: Christine M. Gravelle

STANDING CHAPTER 13 TRUSTEE'S OBJECTION TO DEBTOR(S) MODIFIED PLAN

The Standing Chapter 13 Trustee, Albert Russo, objects to the Debtors' Modified Plan for the following reasons:

1. The modified plan does not pay the required threshold dividend to general unsecured creditors as determined by the originally confirmed plan. The case must continue to pay 100% to unsecured creditors.
2. Since the plan must remain at 100% the reclassification of the Bank of NY Claim will make it infeasible.

WHEREFORE, the Standing Chapter 13 Trustee objects to Debtors' Modified Plan.

DATED: 10/30/18

By: /s/ Albert Russo
Albert Russo, Standing Chapter 13 Trustee
By: Erik D. Collazo, Staff Attorney